

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

FILED
JUN 06 2023
Mark C. McCartt, Clerk
U.S. DISTRICT COURT

In the Matter of the Search of
Information Associated with Facebook Usernames
"ben.tom.311056" and "ben.argun.3" that is Stored at a
Premises Controlled by Meta Platforms, Inc.

Case No. 23-mj-345-CDL**FILED UNDER SEAL****APPLICATION FOR A SEARCH WARRANT**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment "A." This court has authority to issue this warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A). Located in the Northern District of California, there is now concealed:

See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section**Offense Description***18 U.S.C. § 922(a)(1)(A)****Unlicensed Manufacturing and Dealing of Firearms**

The application is based on these facts:

See Affidavit of SA Darrell G. Withem, ATF, attached hereto.

- ☒ Continued on the attached sheet.
☐ Delayed notice of ____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

DARRELL WITHEM

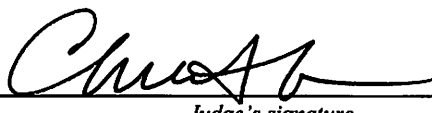
Digitally signed by DARRELL WITHEM
Date: 2023.06.06 10:27:46 -05'00'*Applicant's signature*

Darrell G. Withem, SA, ATF

Printed name and title

Subscribed and sworn to by phone.

Date:

June 6, 2023City and state: Tulsa, Oklahoma

Judge's signature

Christine D. Little, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**In the Matter of the Search of
Information Associated with Facebook
Usernames “ben.tom.311056” and
“ben.argun.3” that is Stored at a
Premises Controlled by Meta
Platforms, Inc.**

Case No. _____

FILED UNDER SEAL

Affidavit in Support of an Application for a Search Warrant

I, Darrell G. Withem, being first duly sworn under oath, depose and state:

Introduction and Agent Background

1. I make this affidavit in support of an application for a search warrant for information associated with the Facebook accounts “ben.tom.311056” and “ben.argun.3” that is stored at a premises owned, maintained, controlled, or operated by Meta Platforms, Inc. (“Meta”), an electronic communications service and/or remote computing service provider headquartered at 1601 Willow Road in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Meta to disclose to the government information (including the content of communications) in its possession, pertaining to the subscriber or customer associated with the Facebook usernames “ben.tom.311056” and “ben.argun.3”, as further described in Section I of Attachment B. Upon receipt of the information

described in Section I of Attachment B, government-authorized persons will review the information to locate the items described in Section II of Attachment B.

2. I am a federal law enforcement officer as defined under Rule 41(a)(2)(C) and am authorized to request this search warrant because I am a government agent who is engaged in enforcing federal criminal laws and I am within the category of officers authorized by the Attorney General to request such a warrant. I am a Special Agent with the ATF and have been so employed since July 2004. I am currently assigned to the Tulsa, Oklahoma Field Office; Dallas Field Division. Prior to my employment with ATF, I was a Police Officer for the Tulsa Police Department in Tulsa, Oklahoma, where I was employed for approximately five-and-a-half years as a commissioned law enforcement officer. I am a graduate of the Federal Law Enforcement Training Center and ATF National Academy in Glynco, Georgia. As a result of my training and experience as an ATF Special Agent, I am familiar with federal firearm laws and know that it is unlawful for a person to manufacture and sell firearms without a federal license in violation of Title 18, United States Code, Section 922(a)(1)(A).

3. I am familiar with the facts and circumstances of this investigation. The facts set forth in this affidavit are based on my personal observations, knowledge obtained from other law enforcement officers, my review of documents related to this investigation, conversations with others who have personal knowledge of the events and circumstances described herein, and a review of open-source information

including information available on the Internet. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact I or others have learned during the course of this investigation.

4. Based on my training, experience, and the facts as set forth in this affidavit, there is probable cause to believe the identified Facebook accounts contain evidence of violations of Title 18, United States Code Section, 922(a)(1)(A) (Unlicensed Manufacturing and Dealing of Firearms) by **Benjamin Thomas BRANSFORD**. I have not included every detail of the investigation. In addition, all statements contained in this affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

Jurisdiction

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States ... that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

6. When the government obtains records pursuant to § 2703, or pursuant to a search warrant, the government is not required to notify the subscriber of the existence of the warrant. 18 U.S.C. § 2703(a), (b)(1)(A), (c)(2), and (3). Additionally, the government may obtain an order precluding Meta from notifying the subscriber

or any other person of the warrant, for such period as the Court deems appropriate, where there is reason to believe that such notification will seriously jeopardize the investigation. 18 U.S.C. § 2705(b).

Meta Background

7. Meta owns and operates Facebook, a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook users can use their accounts to share communications, news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

8. Meta asks Facebook users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Each Facebook user is assigned a user identification number and can choose a username.

9. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's

account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

10. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

11. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming "events," such as social occasions, by listing the event's time, location, host, and guest list. In addition, Facebook users can "check in" to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user's profile page also includes a "Wall," which is a space where the user

and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

12. Facebook users can upload photos and videos to be posted on their Wall, included in chats, or for other purposes. Users can “tag” other Facebook users in a photo or video and can be tagged by others. When a user is tagged in a photo or video, he or she generally receives a notification of the tag and a link to see the photo or video.

13. Facebook users can use Facebook Messenger to communicate with other users via text, voice, and video. Meta retains instant messages and certain other shared Messenger content unless deleted by the user, and also retains transactional records related to voice and video chats, including the date of each call. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile.

14. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

15. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

16. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

17. Each Facebook account has an activity log, which is a list of the user's posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as "liking" a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user's Facebook page.

18. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

19. In addition to the applications described above, Meta provides users with access to thousands of other applications ("apps") on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user's access or use of that application may appear on the user's profile page.

20. Meta also retains records of which IP addresses were used by an account to log into or out of Facebook, as well as IP address used to take certain actions on the platform. For example, when a user uploads a photo, the user's IP address is retained by Meta along with a timestamp.

21. Meta retains location information associated with Facebook users under some circumstances, such as if a user enables “Location History,” “checks-in” to an event, or tags a post with a location.

22. Social networking providers like Meta typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Meta about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Meta typically retains records about such communications, including records of contacts between the user and the provider’s support services, as well as records of any actions taken by the provider or user as a result of the communications.

23. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or, alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user’s IP log, stored electronic communications, and other data retained by Meta, can indicate who has used or controlled the Facebook account. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant

at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time. Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Meta logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, location information retained by Meta may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

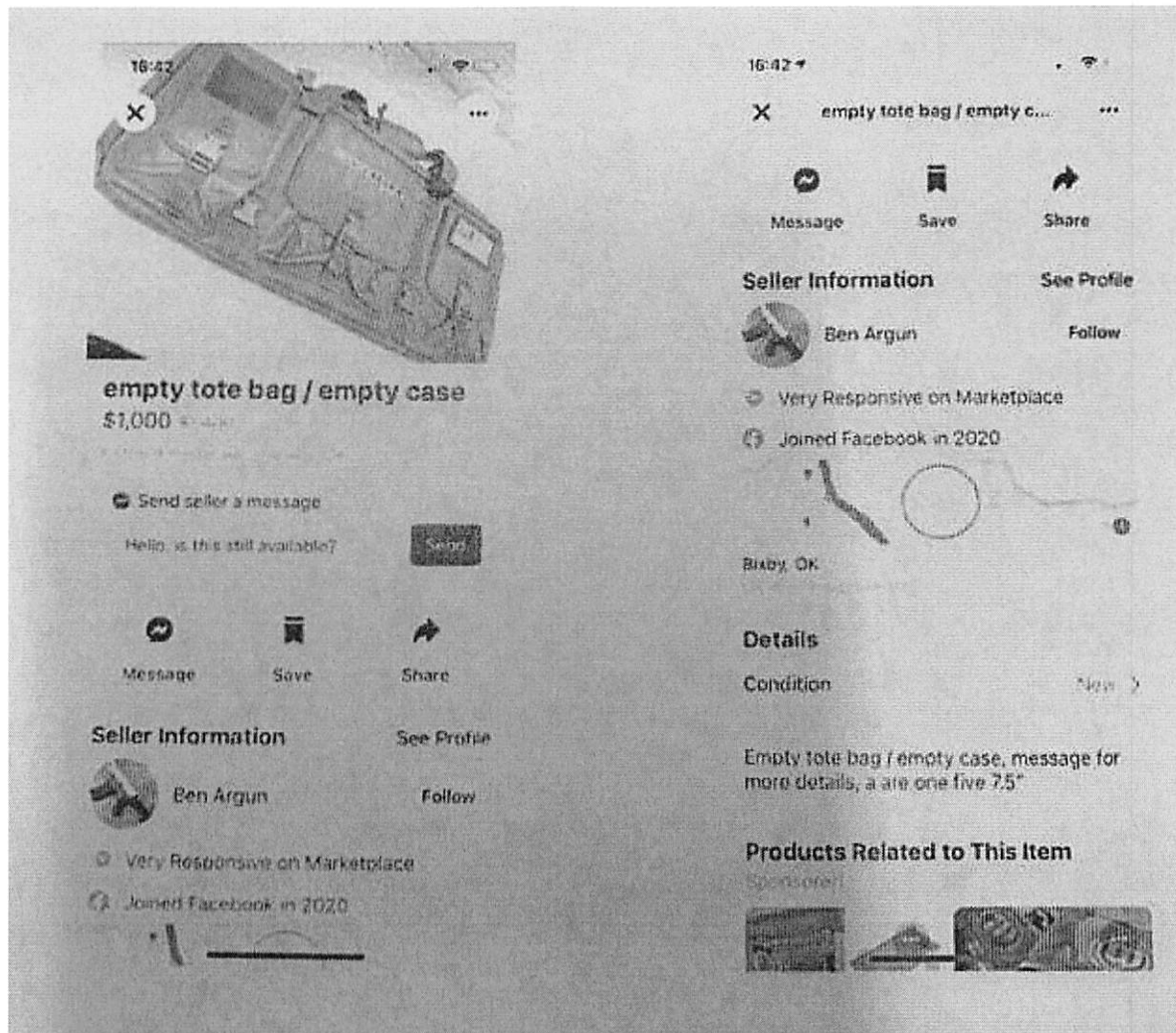
24. Therefore, Meta's servers are likely to contain all the material described above, including stored electronic communications and information concerning

subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

25. I previously requested that Meta preserve any information for the accounts listed in Attachment A.

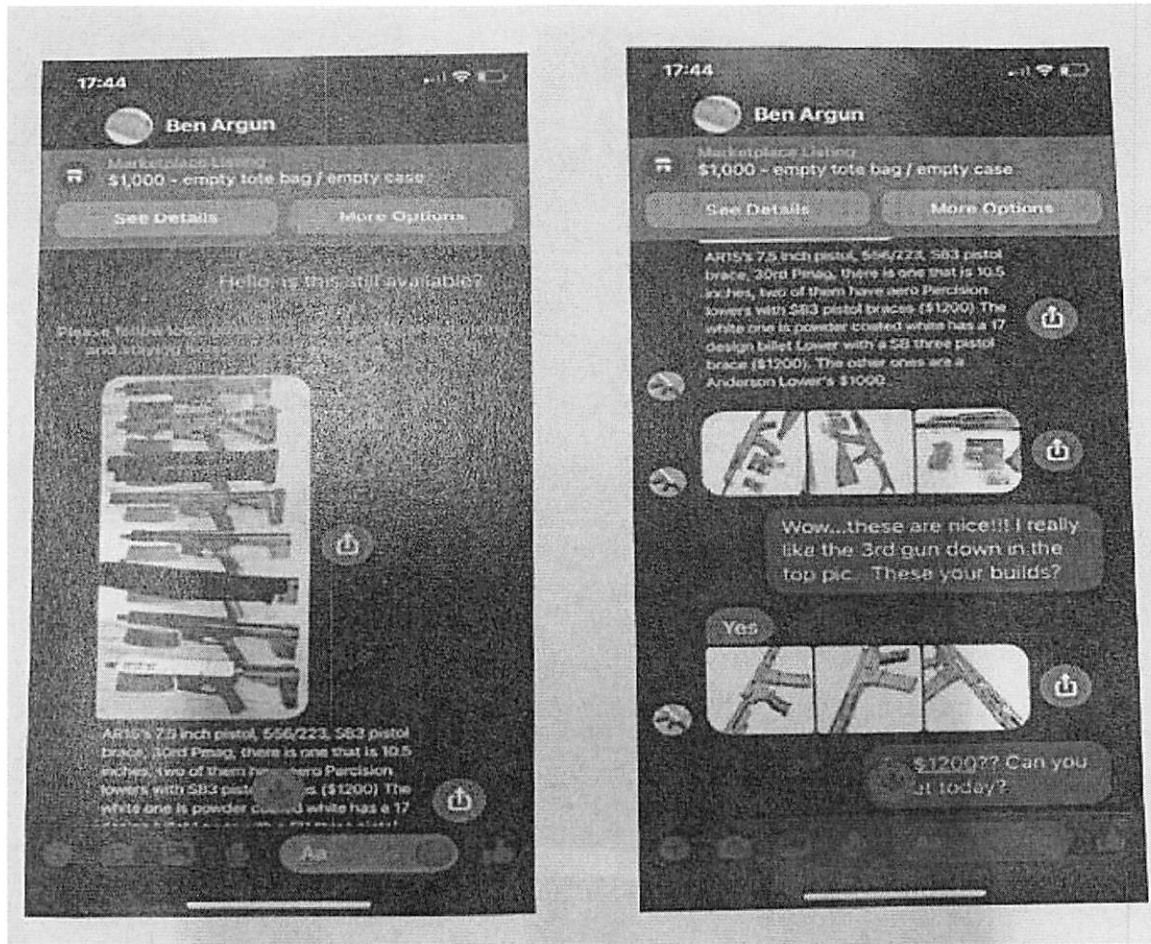
Probable Cause

26. On March 5, 2021, I was notified about an individual assembling AR and AK type rifles and pistols and subsequently selling these assembled firearms on Facebook Marketplace under the Facebook screen name of “Ben Argun.” Facebook Marketplace posts by “Ben Argun” advertised “Empty Totes/Empty Cases” for \$1000.00 and displayed a picture of a rifle case. Further in the post, “Ben Argun” spelled out “Empty tote/empty case, message for more details, a are one five 7.5.” Through my training and experience, I understood that this individual was advertising an AR-15 type rifle or pistol with a 7.5-inch barrel. This individual wrote the advertisement this way to avoid being flagged by Facebook Marketplace’s system and delisted for violating its policy against sale of firearms on their website.



27. I contacted “Ben Argun” in an undercover capacity and inquired about the firearms being available for purchase. The individual responded almost immediately with a picture of six AR and AK type firearms and a caption providing the description and prices. After further conversation, “Ben Argun” agreed to meet me for the sale of a firearm I had selected from the picture. During the conversation, this individual advised that no ATF Form 4473 was needed because this was a “private” sale. We agreed to meet at a parking lot on the northwest corner of 15100 S.

Memorial Dr., Bixby, Oklahoma, which is within the Northern District of Oklahoma, to complete the sale.



28. Less than an hour later, **Benjamin Thomas BRANSFORD** arrived at the designated time and location in a black in color Ford F-150 truck bearing Oklahoma tag number JJQ-423. I later verified that **BRANSFORD** is the registered owner of this truck. During the meeting, I saw a woman sitting in the front passenger seat and a toddler in a car seat in the rear passenger seat of **BRANSFORD'S** truck. I believe this woman to be Mr. Bransford's wife, Sandra Bransford.

29. After exchanging greetings and confirming with **BRANSFORD** that he was “Ben Argun,” he opened the rear driver’s side door of his truck and I saw an SKS/AK type rifle on the floorboard of the rear passenger compartment. **BRANSFORD** then lifted the back seat up and produced the firearm I had previously selected from the picture that he had sent me through Facebook.

30. At this time, I produced my badge and identified myself as a Special Agent with the ATF. I advised **BRANSFORD** that he was currently in violation of Federal Firearms Laws by manufacturing and then selling the manufactured firearms without a license. I then explained to him how he could obtain the correct license(s) if he wanted to continue this type of business. I verbally warned **BRANSFORD** about continuing in this practice and that if he continued manufacturing firearms without the appropriate license(s), then possible criminal charges could be filed against him. He acknowledged and I took his contact information.

31. On March 8, 2021, I mailed Mr. Bransford an ATF “Cease and Desist” letter.

32. Using a law enforcement database available to the ATF, I determined that **BRANSFORD** has been purchasing numerous firearm lower receivers after my contact with him in March 2021, to include the following:

- a. **Spikes Tactical LLC, Model ST15, Multi-caliber short-barrel rifle, s/n: NSL178550 – Trace number: T20220467608**

This firearm was purchased on April 17, 2022, from Red State Arms (FFL 57307291). Red State Arms shows that they sold this firearm as a

receiver only. On September 11, 2022, TPD Officers recovered this firearm in the Northern District of Oklahoma from an abandoned vehicle that earlier in the night was surrounded by individuals who are listed as documented and/or associates of gang members. The firearm was fully assembled when it was recovered by TPD.

- **Spike's Tactical LLC, Model ST15, Multi-caliber short-barrel rifle, s/n: SRM004239 – Trace number: T20230124636**

This firearm was purchased on June 6, 2022, from Red State Arms as part of a multiple sale of five (5) additional lower receivers. Red State Arms shows that they sold this firearm as a receiver only. On March 3, 2023, ATF Agents executed a federal search warrant at the residence of Jared Shelton, located at 2507 E. 161st Street, Bixby, Oklahoma, within the Northern District of Oklahoma. During the execution of the warrant, the above-mentioned firearm was located and photographed as one fully-assembled piece, but it was not seized because it was not apparent that it met the parameters of the search warrant. Mr. Shelton had been charged by felony Information in Wagoner County District Court case number CF-2021-94 on April 8, 2021, which was still pending on the date of the execution of the search warrant. He was therefore prohibited from receiving this firearm that **BRANSFORD** had procured.

- **Anderson Manufacturing, Model AM-15, 5.56mm caliber pistol, s/n: 21427867 – Trace number: T20230146707**

This firearm was purchased on May 3, 2022, from Red State Arms as part of a multiple sale of fourteen (14) additional lower receivers. Red State Arms shows that they sold this firearm as a receiver only. On March 18, 2023, TPD Officers recovered this firearm during a traffic stop in the area of 2605 N. MLK Blvd., Tulsa, Oklahoma, within the Northern District of Oklahoma. The firearm was fully assembled when it was recovered by TPD. The driver was arrested for Unlawfully Carrying a Firearm and Possession of Marijuana.

33. From my investigation and examining records from the National Tracing Center, I know that since November 19, 2019, Mr. Bransford at a minimum has purchased 79 lower receivers. Of these, at least eleven firearms have been recovered in connection with some crime or under suspicious circumstances, including the instances specified above. This number is only obtained from records that involved the above-mentioned firearms that were recovered and a notation that the above-mentioned firearms were part of a multiple sale of multiple lower receivers.

34. ATF records indicate that **BRANSFORD** has never obtained a federal license to manufacture or deal in firearms.

35. I conducted a publicly accessible search on Facebook to find **BRANSFORD** and determined that the Facebook usernames “ben.tom.311056” and “ben.argun.3” are associated with **BRANSFORD** based on my prior contact with him through Facebook Marketplace as well as through his publicly posted photographs.

Information to be Searched and Things to be Seized

36. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving it on Meta. Because the warrant will be served on Meta, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

37. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Meta to disclose to the government digital copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

38. In conducting this review, law enforcement personnel may use various methods to locate evidence and instrumentalities of the crime(s) under investigation, including but not limited to undertaking a cursory inspection of all information within the account described in Attachment A. This method is analogous to cursorily inspecting all the files in a file cabinet in an office to determine which paper evidence is subject to seizure. Although law enforcement personnel may use other methods as well, particularly including keyword searches, I know that keyword searches and similar methods are typically inadequate to detect all information subject to seizure. As an initial matter, keyword searches work only for text data, yet many types of files commonly associated with e-mails, including attachments such as scanned documents, pictures, and videos, do not store data as searchable text. Moreover, even as to text data, keyword searches cannot be relied upon to capture all relevant communications in an account as it is impossible to know in advance all of the unique words or phrases investigative subjects will use in their communications, and

consequently there are often many communications in an account that are relevant to an investigation but do not contain any searched keywords.

Conclusion

39. Based on the information above, I submit that there is probable cause to believe that there is evidence of violations of Title 18, United States Code, Section 922(a)(1)(A) (Unlicensed Manufacturing and Dealing of Firearms) associated with the Facebook accounts described in Attachment A.

40. I request to be allowed to share this affidavit and the information obtained from this search (to include copies of digital media) with any government agency, to include state and local agencies investigating or aiding in the investigation of this case or related matters, and to disclose those materials as necessary to comply with discovery and disclosure obligations in any prosecutions from this matter.

Respectfully submitted,

DARRELL WITHEM Digitally signed by DARRELL WITHEM
Date: 2023.06.06 10:26:52 -05'00'

Darrell Withem
Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Subscribed and sworn to by phone on June 6, 2023.


CHRISTINE D. LITTLE
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Property to be Searched

This warrant applies to information associated with the Facebook account names “ben.tom.311056” and “ben.argun.3” that is stored at a premises owned, maintained, controlled, or operated by Meta Platforms, Inc., a company headquartered in Menlo Park, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Meta Platforms, Inc. (“Meta”)

To the extent that the information described in Attachment A is within the possession, custody, or control of Meta, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that has been deleted but is still available to Meta, or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Meta is required to disclose the following information to the government for each username listed in Attachment A:

A. All business records and subscriber information, in any form kept, pertaining to the Account, including:

1. All contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
2. All profile information; News Feed information; status updates; videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings;

rejected “Friend” requests; comments; gifts; pokes; tags; and
information about the user’s access and use of Facebook applications;

3. All records or other information regarding the devices and internet browsers associated with, or used in connection with, that user ID, including the hardware model, operating system version, unique device identifiers, mobile network information, and user agent string;
4. All IP logs, including all records of the IP addresses that logged into the account;
5. The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
6. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
7. All past and present lists of friends created by the account;
8. The types of service utilized by the user;
9. All associated logs and metadata;

B. All content, records, and other information relating to communications sent from or received by the Account from January 1, 2021 to present, including but not limited to:

1. The content of all communications sent from or received by the Account, including direct and group messages, and all associated multimedia and metadata, including deleted and draft content, if available;
2. All activity logs for the account and all other documents showing the user's posts and other Facebook activities from January 1, 2021 to present.
3. All photos and videos uploaded by that user ID and all photos and videos uploaded by any user that have that user tagged in them from January 1, 2021 to present, including Exchangeable Image File ("EXIF") data and any other metadata associated with those photos and videos;
4. All other records and contents of communications and messages made or received by the user from January 1, 2021 to present, including all Messenger activity, private messages, chat history, video and voice calling history, and pending "Friend" requests;
5. All "check ins" and other location information;
6. All records pertaining to communications between Meta and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken;

C. All content, records, and other information relating to all other interactions between the Account and other Facebook users from January 1, 2021 to present, including but not limited to:

1. All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
2. All information about the user's access and use of Facebook Marketplace;
3. All information about the Facebook pages that the account is or was a "fan" of;

D. All records of Facebook searches performed by the account from January 1, 2021 to present;

E. All location information, including location history, login activity, information geotags, and related metadata from January 1, 2021 to present.

Meta is further ordered to disclose the above information to the government within **14 days** after service of this warrant.

II. Information to be searched for and seized by the government

All information described above in Section I that constitutes evidence of violations of Title 18, United States Code, Section 922(a)(1)(A) (Unlicensed Manufacturing and Dealing of Firearms), including, for each account or identifier listed on Attachment A:

- a. Communications between the username and others regarding the illegal sales of firearms through Facebook Marketplace from January 1, 2021 to present;
- b. Communications between the user ID and others from January 1, 2021 to present;
- c. Evidence indicating how and when the Facebook account was accessed or used, to determine the geographic and chronological context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- d. Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- e. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).

Certificate of Authenticity of Domestic Records Pursuant to Federal Rules of Evidence 902(11) and 902(13)

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Meta Platforms, Inc. (“Meta”) and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Meta. The attached records consist of _____ gigabytes of data associated with the Facebook account usernames “ben.tom.311056” and “ben.argun.3”. I further state that:

a. All records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Meta, and they were made by Meta as a regular practice; and

b. Such records were generated by Meta’s electronic process or system that produces an accurate result, to wit:

1. The records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Meta in a manner to ensure that they are true duplicates of the original records; and

2. The process or system is regularly verified by Meta, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Rules 902(11) and 902(13) of the Federal Rules of Evidence.

Date

Signature